

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,

Plaintiff,

v.

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

C.A. No. 04-10353-PBS

**AFFIDAVIT OF LAURENCE S. GILLICK**

I, Laurence S. Gillick, hereby depose on oath and state as follows:

1. I am currently the Vice President of Core Technology for Defendant Voice Signal Technologies, Inc. ("Voice Signal"), where I have been employed for six years, except for three months in 2001. I am the most senior technical employee at Voice Signal, and have been privy to all of the company's substantial volume of highly proprietary technical information and trade secrets.

2. Given my exposure to Voice Signal's confidential proprietary information, I was required to execute upon commencement of employment Voice Signal's so-called Proprietary Information and Inventions Agreement, which contains, among other things, a one-year non-compete provision. A true and accurate copy of my executed agreement, dated January 3, 2001, is attached hereto as Exhibit A.

3. On January 23, 2007, I received a voicemail from a recruiter who identified herself as "Caitlin." In the voicemail, Caitlin stated that she was a recruiter for Nuance, and that

she wished to speak with me regarding employment opportunities at Nuance. A true and accurate transcription of the voicemail left by Caitlin is attached hereto as Exhibit B.

4. On January 24, 2007, I returned Caitlin's phone call. During the course of our conversation, Caitlin confirmed that she was representing Nuance and that my name was on a list that had been provided to her along with other employment prospects.

Signed under the pains and penalties of perjury this 7th day of February, 2007.

/s/ Laurence S. Gillick

Laurence S. Gillick

CERTIFICATE OF SERVICE

I hereby certify as follows:

1. This document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 7, 2007.

2. On February 7, 2007, a true and correct copy of this document and the accompanying pleadings was served by hand to Rebecca L. Hanovice, Esq. of Bromberg & Sunstein LLP, 125 Summer Street, Boston, MA 02111.

/s/ Sarah C. Columbia

Sarah C. Columbia